




EXHIBIT D

Rachel Weil

From: Ian Cross <ian@lawinannarbor.com>
Sent: Wednesday, June 25, 2025 1:00 PM
To: Rachel Weil
Cc: Larry Margolis; Jon Marko; Michael Jones; Adam Masin; Sunny Rehisi; Dwan Sanders
Subject: Re: Kohchise Jackson v. CHS TX, Inc., et al.

 74160-5 Records.pdf

 DMC Medical Records.pdf

 Med Rec Lake Huron Medical Center.pdf

Hi Rachel,

Mr. Jackson tells me he has treated at Henry Ford Hospital -Gastroenterology since last summer. He is being treated by Cheryl Cascio, NP. He also saw Dr. Tingting Xiong at Henry Ford for a colonoscopy in October of 2024. His complaints were abdominal cramping and bloody stool, and he was diagnosed with ulcerative colitis.

We have not obtained the medical records for the Henry Ford treatment. Attached the records we provided to former defense counsel. I don't believe we've collected any more medical records, except for the incarceration-related records that defense counsel provided to us.

Thanks,
Ian

On Tue, Jun 24, 2025 at 10:29 AM Rachel Weil <Rachel.Weil@bowmanandbrooke.com> wrote:

Counsel:

First, I wanted to introduce myself, as I recently joined Bowman and Brooke and this case team.

Second, in Defendants Corizon Health, Inc. and Keith Papendick, M.D.'s First Set of Interrogatories to Plaintiff, Interrogatory No. 1 asked you to "Identify each medical treater/facility (not including the Michigan

Department of Corrections or Corizon Health, but including any other physician; medical professional; hospital; other medical facility; etc.) that provided Plaintiff with any type of medical care at any time from the year 2000 through the present, including after his incarceration ended with the MDOC, providing the dates or approximate dates of treatment and providing the chief health complaints (or other reasons) for which he saw each treater.” Pursuant to your duty to supplement your responses, please provide us with the identities of any additional medical providers or facilities that have treated Plaintiff for any gastrointestinal issue, illness, disorder, or concern since October 8, 2020, when you responded to the Interrogatories.

Third, if you have collected any additional medical records since October 8, 2020 (your responses to the discovery requests suggest that you provided certain records directly to former defense counsel), please provide us with those updated records.

Thank you, Rachel Weil

Rachel B. Weil

Partner

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